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## Code of Conduct of Holík International s.r.o.

This Code of Conduct is meant to highlight the most important statutory measures and rules of ethical conduct. The full text of each guideline is available from the Company's Human Resources Department.

The Code is mandatory for all our employees. It does not apply to external entities.

### 1. Fundamental principles and criteria

#### The lawful conduct

One of our basic principles is to comply with the law. It is a minimum standard for every employee, but we expect our employees to adhere to the standards of behaviour that are common in society.

#### Responsibility for the company's reputation

All employees are obliged to take responsibility for the good name of Holík International s.r.o. in the performance of their activities.

#### Ethical conduct

Everyone is expected to behave in a way that is respectful, honest and leaves no doubt about their integrity. We value the wide range of skills, capabilities and experience represented by our employees.

Discrimination, bullying, violence, sexual harassment, threats or any other form of inappropriate behavior is prohibited in our organization. If we become aware of any unacceptable behavior, we will take appropriate action.

#### Structure of employees

We recruit and train prospective and current employees without distinction as to race, color, sex, sexual orientation, religion, national origin, disability, or any other legally protected status.

We maintain a partial employment policy. Where possible, we actively seek to integrate workers from special workforce groups within the organization's capabilities.

#### Social responsibility

We want our relationships with colleagues and business partners to be conducted in a respectful and socially responsible manner. We adhere to the principles set out in the UN Declaration on Human Rights and respect the fundamental principles and rights set out by the International Labour Organisation. Among other things, this means:

- **No child labour** – we cannot employ anyone who has not reached the age of completion of primary education or who has not reached the minimum age for employment (as defined by the regulations of the country in which we operate as an organisation).
- **Treating employees humanely** – we do not accept any forced labour, physical abuse or any other form of unwanted treatment of our employees or those we deal with.

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- **We respect the contributions of our employees** – we reward fairly, promote based on identified suitability, and support the personal and professional development of our employees.
- **We support the right to freedom of association** – we recognise the right of every worker to join a trade union.
- **We pay fairly** – we guarantee that employees receive a minimum wage that complies with current legislation.

### **Health, safety and environmental protection**

All employees have a responsibility to minimise risks to people and the environment as far as possible. Our processes, tools and equipment comply with the relevant applicable legislation on occupational safety, health, fire protection and environmental protection. Our workplaces are alcohol and drug free. These substances are strictly prohibited in the workplace.

## **2. Rules for preventing conflicts of interest**

### **Bribery and corruption**

Bribery and corruption are completely excluded within our society. We comply with corruption laws wherever we operate.

Employees who unduly influence customers or suppliers, or who seek to influence others in this way, are acting improperly and are personally liable for this conduct.

### **Receiving or giving gifts and entertainment**

Receiving or giving gifts and entertainment must be approached very critically. The value of the gift or entertainment should be proportionate. If there is any doubt, written approval should be sought from the relevant company director.

### **Relations with suppliers and customers**

Agreements with customers and suppliers shall be in writing and shall be complete and unambiguous. Suppliers should be selected solely on competitive grounds, after comparison of price, quality, performance and suitability of the products or services offered.

### **Insider trading**


An employee may have access to confidential information about our company. Insider trading is illegal. Employees have a duty to protect such confidential information.

### **Secondary activity**

Secondary activities of an employee are permitted only if such activities are approved in advance by the company's director.

### **Possibility to appeal to a business partner**

Employees who wish to appeal to a business partner of Holík International s.r.o. for a private purpose and are authorized to issue orders and/or to execute them, are obliged to report this fact to the management of the company in order to avoid conflicts of interest.

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### 3. Rules concerning information and communication activities

#### Acting on behalf of Holík International s.r.o.

An employee may not disclose information about Holík International s.r.o. or its activities to third parties without the express consent of the management.

#### Social media

We rely on every member of staff to use social media sensibly. If he/she posts information online, it must be clear from that information that it is his/her personal views and not the views of Holík International s.r.o.

#### Confidential information

The company's confidential information must remain confidential at all times. This applies even after termination of employment.

#### Data protection and information security

Each employee is responsible for ensuring that company data and assets are protected against loss, damage and misuse. Each employee must use our information system responsibly. Software may not be downloaded, copied or distributed (unless there is explicit management approval). Each employee shall protect login information and not pass it on to third parties.

### 4. Irregularity reporting

Every employee has the right to raise with his/her supervisor or anonymously through the "confidential box" any working conditions which indicate that a violation of the rules set out in this Code has occurred.

### 5. Inspection

The company is responsible for compliance with the rules set out in this Code. Compliance with these rules will be monitored through internal audits. Management will review the content of the Code annually and update it if necessary.

June 13th, 2023

Tomas Pekar, CEO